

Jeffrey W. Pagano  
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March 13, 2017

**VIA ECF**

The Honorable Steven I. Locke  
United States Magistrate Judge  
United States District Court for  
the Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re: Cecil Thomas et al. v. TXX Services, Inc. et al.**  
**U.S. District Court for the Eastern District of New York**  
**Civil Action No. 2:13-CV-02789- SIL**

Dear Magistrate Judge Locke:

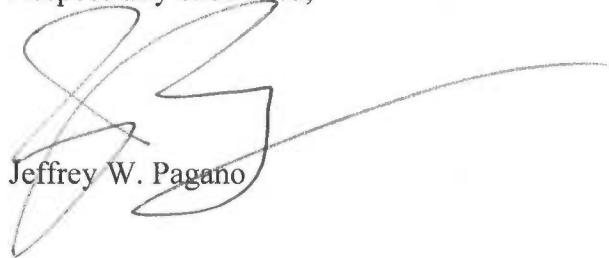
We represent Defendants TXX Services, Inc. ("TXX") and Patricia Hunt (collectively, "Defendants") in connection with the above-referenced action. For the reasons stated in greater detail below, we respectfully request a short extension of the date by which Defendants must provide the names, addresses and, where available, mobile phone numbers of drivers/helpers/loaders/vendors, and the corresponding date for Plaintiffs to give notice. As set forth in Your Honor's March 1, 2017 Minute Order [Dkt. 182] issued following the Conference recently conducted in this action, such names, addresses and mobile phone numbers are currently due to be provided to Plaintiffs' counsel by March 31, 2017. We respectfully request that this date be extended to April 14, 2017, and that the corresponding date for distribution of notice by Plaintiffs' counsel be extended from April 15, 2017, the date set forth in the Minute Order, for the corresponding period of time, to April 28, 2017.

Good cause exists for the requested extension of time. TXX has just agreed to accept large new accounts for the brokering of transportation services. As a result, the TXX employees needed to gather and analyze the data needed to comply with the current deadline will not have sufficient time to do so by the currently scheduled date. In addition, I am lead counsel on a National Labor Relations Board trial to be conducted in San Juan, Puerto Rico, commencing March 28, 2017. For these same reasons, as we have notified counsel for Plaintiffs, TXX will require additional time, from March 21, 2017 to April 14, 2017, in order to inform counsel for Plaintiffs of the names of the twenty (20) individuals filing consents who will be part of the initial stage of discovery. While this deadline is not set forth in Your Honor's Minute Order, it was addressed before the Court at Conference. Counsel for Plaintiffs consents to the requests for extension set forth in this correspondence.

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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'JP', with a long horizontal line extending to the right.

Jeffrey W. Pagano

cc (via ecf): M. Kirschenbaum, Esq.  
D. Schulman, Esq.

NYACTIVE-15692756.1